

1 [Parties and Counsel Listed on Signature Pages]
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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Civil Case No. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

THIS FILING RELATES TO:

ALL ACTIONS

**META AND NEW JERSEY'S
STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
COMPLETE THE RULE 30(b)(6)
DEPOSITION OF THE NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
AND DIVISION OF CONSUMER
AFFAIRS**

Honorable Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to Civil Local Rules 6-2 and 7-12, the New Jersey Office of the Attorney General and
 2 Division of Consumer Affairs (“New Jersey”) and Defendants Meta Platforms, Inc.; Instagram, LLC;
 3 Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together with
 4 New Jersey, the “Stipulating Parties”), through their undersigned counsel, hereby stipulate as follows:

5 1. Under the schedule ordered by Magistrate Judge Kang on July 2, 2025, the current
 6 deadline for Meta to complete its fact and Rule 30(b)(6) deposition of New Jersey witness(es) is August
 7 29, 2025. *See* ECF 2091.

8 2. The Stipulating Parties have been engaged in ongoing discussions regarding New
 9 Jersey’s privilege log and the scope and applicability of the deliberative process privilege to documents
 10 included on that log. Although the Stipulating Parties have met and conferred on multiple occasions in
 11 an attempt to resolve this dispute without requiring the Court’s intervention, both Stipulating Parties
 12 currently anticipate needing to submit Joint Letter Briefing on this issue.¹

13 3. The Stipulating Parties met and conferred on August 20, 2025 under Rule H.2 of the
 14 Court’s Standing Order for Discovery in Civil Cases and agreed that it would be most efficient to
 15 postpone Meta’s Rule 30(b)(6) deposition of the State of New Jersey until after the Court has ruled on
 16 the Stipulating Parties’ anticipated briefing regarding New Jersey’s privilege claims. The Stipulating
 17 Parties are in the process of agreeing to a Joint Letter Briefing Schedule and anticipate raising this
 18 discovery dispute for the Court’s attention promptly.

19 4. Pending resolution of the aforementioned discovery dispute, the Stipulating Parties have
 20 agreed to extend Meta’s deadline for completing its Rule 30(b)(6) deposition of the State of New Jersey
 21 on the following terms:

22 a. Subject to the Court’s approval, Meta’s deadline to complete its Rule 30(b)(6)
 23 deposition of the State of New Jersey shall be extended to a time no earlier than
 24 four (4) weeks following substantial completion of any production made in

25
 26 ¹ In light of the Ninth Circuit’s order vacating the “Party Discovery on Third-Party State Agencies
 27 Pursuant to Fed. R. Civ. P. 34” decision (ECF 1117), New Jersey respectfully maintains that Meta must
 28 meet-and-confer and exchange letter briefs with state agency counsel concerning this dispute. To the
 extent oral argument is granted, state agency counsel will appear before this Court. New Jersey commits
 to facilitate Meta’s meet-and-confers and letter brief exchanges with state agency counsel.

1 connection with the forthcoming discovery dispute, or no earlier than four (4)
2 weeks following the Court's resolution of the discovery dispute if no further
3 action is ordered.

4 b. New Jersey reserves all rights related to the Rule 30(b)(6) deposition of the State
5 of New Jersey. This agreement does not constitute a waiver of any objections
6 New Jersey or its state agencies have or may raise with respect to this deposition,
7 nor does it alter any requirements or limitations imposed on this deposition by
8 previous court orders, aside from the deadline for completion of such deposition.
9 New Jersey also reserves all rights to seek relief from ECF 1646 in response to
10 the Ninth Circuit's order vacating ECF 1117.

11 c. Meta reserves all rights related to the Rule 30(b)(6) deposition of the State of New
12 Jersey, including without limitation the right to dispute any objections that New
13 Jersey may raise or relief that New Jersey may seek with respect to any Court
14 orders relating to the Rule 30(b)(6) deposition.

15 5. This Court has previously extended Meta's deadline to complete fact and Rule 30(b)(6)
16 depositions of New Jersey witnesses twice. *See* ECF 1696, 2091. This stipulated extension of the
17 deadline for Meta to complete the Rule 30(b)(6) deposition of New Jersey does not and will not affect
18 any other deadlines already set or that may be set in this action, nor the deposition time limits already set
19 in ECF 1696, nor does it affect any party's or non-party's rights in relation to any other deadlines. The
20 Stipulating Parties reserve all rights with respect to any arguments regarding this extension's potential
21 impact (if any) on the Stipulating Parties' trial scheduling.

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2 DATED: August 29, 2025

Respectfully submitted,

COVINGTON & BURLING LLP

3 By: /s/ Ashley M. Simonsen

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10
11 **MATTHEW J. PLATKIN**

12 Attorney General
State of New Jersey

13 /s/ Kashif T. Chand

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20 *Attorney for Plaintiffs New Jersey Attorney General
and the New Jersey Division of Consumer Affairs*
21 *Matthew J. Platkin, Attorney General for the State of
New Jersey, and Elizabeth Harris, Acting Director of
the New Jersey Division of Consumer Affairs*

1 **ATTESTATION**

2 I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence
3 to the filing of this document has been obtained from each signatory hereto.

4 Dated: August 29, 2025

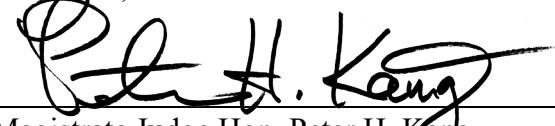
5 By: /s/ Ashley M. Simonsen
Ashley M. Simonsen

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1 **[PROPOSED] ORDER**
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3 By agreement of the Parties, and for good cause shown, **IT IS SO ORDERED.**
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6 Dated: August 29, 2025
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Magistrate Judge Hon. Peter H. Kang